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Attorney for David VanBeenen

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSH HALL, and
DAVID VAN BEENEN,

Defendant.

)
)
) Case No. CR 10-229-BR

)
) MOTION TO FILE MOTION UNDER
) SEAL

Defendant David VanBeenen, through his attorney, Thomas K. Coan, move the court for an order allowing him to file the enclosed motion *ex-parte* and under seal because it contains confidential work product that should not be shared with the government.

DATED this 22nd day of March 2011.

Thomas K. Coan
Thomas K. Coan, OSB 89173
Attorney for Defendant Van Beenen